Comments: Silver Maple Claims Site

The draft site investigation report and associated HRS package for the Silver Maple Claims Site are generally of good quality. However, during the review process certain inadequacies were identified. Comments are included below:

SUMMARY

1. Information should be included on the presence of sensitive environments and significant human populations which could potentially be affected by site contaminants.

DEGREE OF RISK TO HUMAN HEALTH AND THE ENVIRONMENT

2. Results of sampling efforts are interpreted, however actual contaminant concentration values for each sample are not provided. It would prove helpful to include a map with sample locations and a table showing the significant values associated with these samples.

3. Paragraph five states that "the decrease in silver and mercury and the increase in lead appears attributable to both ground water dilution for silver and mercury and an increased lead contribution from ground water contact with onsite tailings." Samples of seeps and springs along the BLM reach of Silver Creek may provide insight into actual lead concentrations contributed to surface water by tributary ground water.

4. Paragraph eight states that lead and mercury levels in ground water exceed those of surface water. However, previous statements attribute decreases in mercury levels in surface water to dilution by tributary ground water. Again, a sample of springs and seeps along the length of the BLM parcel may help clarify whether contaminant concentration is the result of a flow driven or flow dilution relationship along the stretch of Silver Creek in question.

CONTAINMENT AND ACCESSIBILITY

5. Some analysis of flood danger to existing tailings piles should be included in this section. Analysis of flood plains and hydrologic events which could potentially wash tailings downstream should be considered.

GROUND WATER CHARACTERISTICS AND USE

6. An evaluation of water withdrawal from the deeper aquifers in the region should be made. The potential population affected by possible deep aquifer contamination should be considered and the possibility for communication between the shallow alluvial and the deeper aquifers in the region should be considered.

RISK CHARACTERIZATION

7. Under the heading "determination of exposure pathways" an assessment of exposure to target populations via windblown contaminants should be addressed. The air pathway seems to be the most likely route of exposure and appears to be under-emphasized in this investigation. In order to adequately assess the affects of this site on nearby target populations, an evaluation of airborne contamination should be considered.

HAZARDOUS RANKING SYSTEM SCORE SHEET

The following comments pertain to the HRS Score Sheet performed for this site investigation:

GROUNDWATER TARGETS

8. Although the site has scored an observed release to the shallow, alluvial aquifer, there are no significant target populations utilizing this aquifer and therefore no significant score. It may prove beneficial to evaluate the potential for contaminant migration into the

deeper aquifers and document the population served by these deeper aquifers. This method may more adequately assess the potential for significant exposure from the tailings piles.

SURFACE WATER ROUTE

9. Under the"Distance to Sensitive Environments" heading the statement is made that, "it is unknown whether there are any sensitive environments in the area but it is assumed that there are none present." This question should be addressed by making inquiries to various officials from the U.S fish and Wildlife Service or state and local fish and game commissions.

AIR PATHWAY

10. In order to adequately assess the impacts of this site on the health of individuals residing in the surrrounding area, contaminant migration via the air pathway should be evaluated. Since this pathway is the most likely route for contaminant migration, a detailed sampling regime should be applied to the air route around the tailings piles. In order to adequately assess the effects of the tailings on human health and the environment, the contribution of these tailings to the contamination of the ambient air around the site should be documented.